

# Exhibit A

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SAN ROCCO THERAPEUTICS, LLC,

Plaintiff,

v.

Case No.: 1:23-cv-10919-ADB

NICK LESCHLY, MITCHELL FINER, PHILIP  
REILLY, CRAIG THOMPSON, THIRD ROCK  
VENTURES, LLC, BLUEBIRD BIO, INC., AND  
2SEVENTY BIO, INC.,

Defendants.

**CORRECTED DECLARATION OF DEFENDANT CRAIG THOMPSON, M.D. IN  
SUPPORT OF HIS MOTION TO DISMISS PURSUANT TO  
FEDERAL RULES OF CIVIL PROCEDURE 12(B)(2) AND 12(B)(6)**

I, Craig Thompson, M.D., hereby depose and state:

1. I am over eighteen years of age and am legally competent to provide this Declaration. This Declaration is based upon my personal knowledge.

2. I make this Declaration in support of my Motion to Dismiss Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6).

3. I primarily reside in New York, New York. I have lived in New York, New York, for 13 years. Prior to that time, I lived in Philadelphia, Pennsylvania, for 11 years.

4. I also own secondary residences in Old Saybrook, Connecticut, and Sawyer, Michigan.

5. I do not own any personal or real property, have a mailing address, or a place of business in Massachusetts.

**Memorial Sloan Kettering Cancer Center**

6. On November 1, 2010, I was appointed as President and CEO of Memorial Sloan Kettering Cancer Center (“MSK”).

7. I held those positions until I resigned from both positions, effective September 19, 2022. I remain a member of the faculty at MSK, both in the Department of Medicine at the MSK Hospital and as a researcher in the Sloan Kettering Institute.

**Agios Pharmaceuticals**

8. In 2007, I founded Cancer Metabolism Therapeutics, Inc. (“CMT”), along with Dr. Tak Mak from the University of Toronto and Dr. Lewis Cantley at Beth Israel Deaconess in Boston. Michael Su was CMT’s President and first employee. In 2008, CMT became Agios Pharmaceuticals, Inc. (“Agios”).

9. From 2007 until 2008, I served on the company’s Board of Directors. Starting in March 2008, I had observation rights to attend Board of Directors’ meetings; this right ended in

June 2008. Dr. Mak thereafter became the founder-designated Board observer. From its inception in 2008 until 2022, I served on the scientific advisory board at Agios, for which I received monetary compensation as a consultant. My role on the scientific advisory board effectively ended in 2020, when Agios sold off its oncology business, though I stayed on until 2022 while the scientific advisory board transitioned away from oncology.

10. As part of the founding of Agios, Dr. Mak, Dr. Cantley, Dr. Su and I received founders' shares in the company.

11. I sold approximately half of my founders' shares in Agios in 2014, after the company went public in 2013.

12. I placed nearly all of the remaining founders' shares in an irrevocable trust for my children. The founders' shares in the irrevocable trust were sold in 2021.

13. I sold the entirety of my remaining founders' shares of Agios in early 2018.

14. I do not have any other shares or holdings in Agios, and I have not held any interest, shares, or holdings in Agios since 2018.

#### **Relationships with Other Defendants**

15. While I have had a few conversations with Nick Leschly since 2012, I do not believe that I have spoken to him since 2016.

16. I have never met, or to my knowledge, communicated with Mitchell Finer.

17. I have never met, or to my knowledge, communicated with Philip Reilly.

18. I have never owned any interest in Third Rock Ventures LLC. After the Agios transactions, to my knowledge, I have not been involved in a transaction where Third Rock was a party.

19. I have never owned any interest in bluebird bio, Inc.

20. I have never owned any interest in 2seventy bio, Inc.

21. I have never owned and have not been promised any interest in bluebird bio, Inc.'s BB305 drug product.

Sworn under the pains and penalty of perjury this 11<sup>TH</sup> day of December, 2023.

A handwritten signature in black ink, appearing to read "Craig B. Thompson", written over a horizontal line.

Craig Thompson, M.D.